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November 16, 2017

ROI-18-A-005

Frank Gardner
Environmental Protection Agency
5 Post Office Square
Suite 100; Mail Code OSRR7-2
Boston, MA 02109-3912

Subject: FY 2018 EPA Brownfields Assessment Grant Proposal

Mr. Gardner:

On behalf of the Central Massachusetts Regional Planning Commission (CMRPC) and our forty member communities, please accept this proposal for US Environmental Protection Agency funding for brownfields assessment activities. We request \$300,000 in total EPA funding.

Central Massachusetts was once home to major manufacturers of machine tools, textile machinery, abrasives, wire and other products that supported a thriving working-class region. Today, while our economy is transitioning successfully to an "eds and meds" focus, many former manufacturing sites in the area remain contaminated and underutilized. If funded, this grant will enable CMRPC to assist our member communities as we work to make the region a more vibrant place to live and work for today's residents.

CMRPC is a grant-funded regional planning agency created by state statute to serve forty member cities and towns in Massachusetts's central plateau. Through a state planning assistance grant and internal funds, CMRPC over the last year has led a regional brownfields planning process that identified fifteen neighborhood-scale areas of brownfields interest where brownfields remain pervasive, but resources to address them are lacking. EPA brownfields assessment funding will provide a critical step in implementing the regional plan's recommendations and serving our region's high-need communities.

Please do not hesitate to contact our brownfields team (Principal Planner Andrew Loew and Regional Services Manager Trish Settles) or me if you have any questions or need further information regarding this proposal. Thank you for your thoughtful consideration.

Sincerely,

Janet A. Pierce,
Executive Director

Attachments: Regional Priorities Form/Other Factors Checklist, State Letter

- A. Applicant: Central Massachusetts Regional Planning Commission
2 Washington Square, Union Station
Worcester, MA 01604
- B. Funding Requested: Assessment, \$300,000 (\$200,000 hazardous substances, \$100,000 petroleum), Community-wide
- C. Location: Forty municipalities in Worcester County, Massachusetts:

Auburn, Barre, Berlin, Blackstone, Boylston, Brookfield, Charlton, Douglas, Dudley, East Brookfield, Grafton, Hardwick, Holden, Hopedale, Leicester, Mendon, Millbury, Millville, New Braintree, North Brookfield, Northborough, Northbridge, Oakham, Oxford, Paxton, Princeton, Rutland, Shrewsbury, Southbridge, Spencer, Sturbridge, Sutton, Upton, Uxbridge, Warren, Webster, West Boylston, West Brookfield, Westborough, and Worcester
- D. Site Specific: N/A
- E. Contacts: Project Director – Andrew Loew, Principal Planner, 2 Washington Square, Union Station, Worcester MA 01604. Phone: (508) 459-3339 Email: aloew@cmrpc.org

Chief Executive – Janet A. Pierce, Executive Director, 2 Washington Square, Union Station, Worcester MA 01604. Phone: (508) 459-3319 Email: jpierce@cmrpc.org
- F. Population: The CMRPC region's population was 556,698 at the most recent US Census in 2010; the region does not include nor is it a part of a county experiencing persistent poverty
- G. Regional Priorities Form/Other Factors Checklist:
See attached
- H. Letter from the State Environmental Authority:
See attached

Appendix 3 – Regional Priorities Form/Other Factors Checklist

Name of Applicant: Central Massachusetts Regional Planning Commission

Regional Priorities Other Factor

If your proposed Brownfields Assessment project will advance the regional priority(ies) identified in Section I.F., please indicate the regional priority(ies) and the page number(s) for where the information can be found within your 15-page narrative. Only address the priority(ies) for the region in which your project is located. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal, it will not be considered during the selection process.

Regional Priority Title(s): Coordinated Public Funding for Brownfields

Page Number(s): 5, 9-10

Assessment Other Factors Checklist

Please identify (with an *x*) which, if any, of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	Page #
<i>None of the Other Factors are applicable.</i>	
Community population is 10,000 or less.	X Pgs. 4, 6
The jurisdiction is located within, or includes, a county experiencing “persistent poverty” where 20% or more of its population has lived in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses and the most recent Small Area Income and Poverty Estimates.	
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Target brownfield sites are impacted by mine-scarred land.	
Project is primarily focusing on Phase II assessments.	X Pg. 6
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion, by identifying in the proposal the amounts and contributors of resources and including documentation that ties directly to the project.	X Pgs. 9-10
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

October 6, 2017

U.S. EPA New England
Attn: Frank Gardner
5 Post Office Square, Suite 100
Mail Code: OSRR07-3
Boston, MA 02109-3912

RE: **STATE LETTER OF ACKNOWLEDGMENT**
Central Massachusetts Regional Planning Commission, Application for EPA Assessment Grant Fund

Dear Mr. Gardner:

I am writing to support the proposal submitted by the Central Massachusetts Regional Planning Commission (CMRPC) under the Fiscal Year 2018 U.S. Environmental Protection Agency (EPA) Brownfield Assessment Grant Program. CMRPC is seeking funding to address sites that have been identified in their State-funded regional brownfields plan as "areas of Brownfields interest". The environmental assessment of these sites will help to initiate the promotion of sustainable and equitable economic development, housing choice, public health, and recreational opportunity in these high-need neighborhoods.

In Massachusetts, state and federal agencies have developed strong partnerships and work together to ensure that parties undertaking Brownfield projects have access to available incentives. The MassDEP, through our regional offices, provides technical support to Brownfield project proponents when regulatory issues arise. If this proposal is selected, MassDEP will work with our state and federal partners to provide the support to CMRPC that will be needed to help make this project a success.

We greatly appreciate EPA's continued support of Brownfield efforts here in Massachusetts.

Sincerely,

Rodney Elliott
Brownfields Coordinator, Bureau of Waste Site Cleanup

cc: Andrew Loew, Principal Planner, CMRPC
Mike LeBlanc, MassDEP-CERO



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1.a. Target Area and Brownfields

1.a.i. Community and Target Area Descriptions (5 points)

Central Massachusetts is one of **America's oldest industrial regions**. Blessed with abundant small rivers and close proximity to the ports and investors in New England's coastal cities, the city of Worcester and its environs provided the necessary conditions for early 19th century mills that required fast-moving water for machine power. In the decades following the opening of the Blackstone Canal in 1828 – which linked Worcester to the port of Providence, RI – factories producing textile-manufacturing equipment, machine tools, wire and other goods supplanted former farm villages. Housing, infrastructure and an immigrant society grew up around the mills.

As recorded in US Census Bureau records, **manufacturing came to dominate employment** in the area, with more than 54% of workers in Worcester in that sector in 1920, and almost 41% in the Worcester metro area as late as 1950. By mid-century, competition from other US regions and overseas combined with technological change to reduce the area's competitive advantage for manufacturing. The 1960s through '80s saw many regional manufacturers downsize, relocate or close. Industrial jobs fell to 30.5% of Worcester metro area employment in 1980, 17.3% in 2000, then to **12.8% in 2015**, with many of the remaining jobs moving from the cities and mill villages to greenfield suburban locations. Despite a recent transition to a more 'eds-and-meds' focused economy, our region is left with the **decayed physical legacy** of its manufacturing heyday and the **socioeconomic dislocation** of its loss. Beyond the many remaining **derelict mill sites**, ex-industrial areas are challenged by **aging and often unhealthy** former **mill-worker housing** (tenements and triple-deckers), **lack of access to jobs**, and **sub-par community amenities**.

In late 2016, the Central Massachusetts Regional Planning Commission (CMRPC) initiated a **regional brownfields plan** funded by a state planning grant. The plan – now complete, pending final public comment – identifies **15 'Areas of Brownfields Interest' (ABIs)** within the 40-town CMRPC region. (See section 2.a for more information on the plan.) If funded for assessment, CMRPC will primarily **target these 15 neighborhood-scale areas** where brownfields are pervasive, but resources to address them are lacking. To demonstrate the broad challenges faced by ABI neighborhoods, in this proposal we describe the ABIs generally and illustrate one in some depth: the **Main Middle, Main South and South Worcester (or District 4) ABI**. Located near downtown Worcester, New England's second-largest city, the District 4 ABI encompasses Worcester's original industrial core. Now home to 34,000 residents of many cultures and languages, it contains dozens of century-old mills – some reused, many vacant – that once employed tens of thousands, and a stock of often substandard historic mill-worker housing.

1.a.ii. Demographic Information and Indicators of Need (5 points)

Residents of the 15 ABIs tend **disproportionately to be economically underprivileged** and are **overrepresented among those who are most vulnerable** to contaminant exposure for **cultural, socioeconomic, or biological** reasons. ABI median household incomes are less than 63% of the regional median while unemployment is 43% higher. Poverty is over twice the regional level and far above the national rate. Young children, among the most vulnerable groups to many contaminants, make up nearly 15% of ABI residents as compared to 11% of regional residents. While 22% of the CMRPC region's residents are people of color and/or Latinos, 40% of ABI residents identify within those categories. Latinos make up 10% of regional residents but are 21.4% of residents in ABIs, and are the dominant linguistic minority (Spanish) in the ABIs and the region. Most populous among the ABIs, Worcester's **District 4 ABI** is an outlier even among other underprivileged neighborhoods. CMRPC's brownfields plan finds that 17% of District 4



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households live on **less than \$10,000** per year, triple the regional level and reflecting pockets of extreme poverty. Minorities (37%) and Latinos (38%) together make up a majority of residents.

Category	15 ABI Target Area	CMRPC Region	Massachusetts	United States
Population	125,016	565,853	6,705,586	316,127,513
Unemployment	10.7%	7.5%	7.5%	8.3%
Poverty	24.8%	11.6%	11.5%	15.5%
Household Income	\$43,370*	\$69,243*	\$67,846	\$53,889
Minority	40.1%	22.2%	27.6%	37.8%
Latino/Hispanic	21.4%	10.0%	10.6%	17.5%
Children < 10 years	14.5%	11.4%	10.9%	12.6%

ABI data were collected at the Census block group level corresponding to ABI boundaries; Unmarked = 2015 5-year ACS; Starred (*) = 2014 5-year ACS (median income data is not yet available for all smaller geographies)

1.a.iii. Description of the Brownfields (5 points)

Nearly **4,600 contaminated sites** in the CMRPC region have been reported to the Massachusetts Department of Environmental Protection's (MassDEP's) **Chapter 21E** privatized voluntary cleanup program since 1993, with almost **500 still in need** of further assessment and/or cleanup. Of all 21E sites, 56% were reported for **petroleum-related** contaminants, while 24% were for **hazardous substances** or mixed contaminants (the rest are unclassified). Because Chapter 21E does not account for hazardous building materials such as asbestos and lead paint and it does include non-brownfield petroleum sites such as road spills, we believe that **eligible hazardous substances brownfields actually predominate** here. This belief is supported by the experience of our last brownfields assessment grant (FY09) and by sites identified in our regional plan.

The **15 ABIs are disproportionately impacted by brownfields** and other contaminated sites. Among 21E sites mapped by MassDEP, the **ABIs contain 37.4% of the region's total and 42.4% of sites where assessment and/or cleanup is not yet complete**. To compare, the densely populated ABIs occupy only 2.4% of the region's land area and are home to only 22% of its residents. Some **1,200 total 21E sites and 150+ 21E sites that still need assessment and/or cleanup** are located in the ABIs. A more nuanced review in the brownfields plan adding local input identifies at least **51 known brownfields** in need of assessment and/or cleanup in the ABIs, plus **14 elsewhere** in the region. These brownfields are primarily ex-manufacturing properties, but also include gas stations, an MGP, dry cleaners, commercial blocks and municipal facilities. They range in size from under a quarter acre to mill complexes of 120 or more acres.

Worcester's **District 4 ABI** is particularly affected by brownfields. CMRPC's plan identifies **242 Chapter 21E sites** in this ABI including **36 that still need assessment and/or cleanup**, in an area of only 2.46 square miles. This translates to **98 sites/square mile with 15/mile still needing assessment and/or cleanup**. Of special concern to the City is the **Crompton & Knowles Loom Works**, a 7-acre multi-parcel manufacturing complex built ca. 1900 that employed 2,800 workers before closing in 1979. Located in a gritty industrial area intermeshed with housing and just two blocks from Canterbury School (Pre-K to Grade 6) and the local Boys & Girls Club, much of the complex is now covered by demolition debris or crumbling pavement. One historic mill in the complex was rehabilitated in 2016 as 94 mostly affordable apartments, made possible by an FY07 **EPA cleanup grant**. Two active noncompliant 21E sites remain in the complex, one for chromium/lead in soil and one for petroleum, and adjacent parcels need post-demolition testing prior to cleanup and/or redevelopment. These include the 2-acre **92 Grand St.** site, which our partner the **Main South CDC** plans to purchase for **redevelopment as new affordable housing**, and which CMRPC recently selected for assessment if EPA funds are awarded.



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1.b. Welfare, Environmental and Public Health Impacts

1.b.i. Welfare Impacts (5 points)

The welfare impacts of brownfields in ABI neighborhoods stem from chronic and pervasive **abandonment** and **disinvestment**. Boarded up mills, vacant storefronts and other blighted properties lead to a loss of population and a general **lack of positive street activity**, which in turn foster **vandalism, illegal dumping, and youth delinquency**. Clark University released a study of 2012-14 crime data in Worcester's **District 4 ABI** showing hotspots for **trespassing, drugs** and **prostitution** around the **Crompton & Knowles** complex and other brownfield sites. Youth crime is a challenge in all ABIs, where young **children make up 15%** of residents, compared to 11% region-wide. These issues are exacerbated by low rates of home ownership – **63% of ABI residents rent**, compared to just 36% elsewhere. Nearly 82% are renters in the **District 4 ABI**. Without many owner-occupants to provide stewardship for their properties, the spiral of neighborhood decline continues, and aging housing continues to degrade. Lack of employment is likewise a concern, particularly in ABIs without easy access to job centers.

1.b.ii. Cumulative Environmental Issues (5 points)

Beyond brownfields, ABI residents face air, water and indoor environmental risks. Air quality in the Boston-Worcester-Providence area is **37th worst among 228 US urban regions** according to the American Lung Association. Some of the largest point sources of toxic emissions and greenhouse gases in the state are located in or adjacent to ABI neighborhoods: a major **waste incinerator** in Worcester's District 5, the state's fourth-largest **power plant** in Charlton near four small-town ABIs, and others. Vehicle emissions from the five limited-access highways and four freight railroads in the CMRPC region likewise contribute to air contamination, especially in Worcester where **three congested highways and both major railroads cut through low-income ABI neighborhoods**. Considered by EPA in 1990 the "most polluted river in the country with respect to toxic sediments", the **Blackstone River** and its tributaries run **through 8 of the 15 ABIs**. High levels of *e.coli* and chemicals routinely make it unsafe for recreation or fishing, threatening environmental justice communities where residents may be unaware of the risks or who may lack the English proficiency to read advisories. ABI residents are more likely to live in **aging homes with lead paint**, with almost **83%** of ABI housing units – **91%** in the Worcester **District 4 ABI** – built before lead paint was banned in the late 1970s. Lead water services and contaminated aquifers present risks to the water supply in some rural ABIs.

Risks are especially high, however, for the disproportionately minority residents of urban ABIs. A 2012 Clark University report ("Environmental Ascription in Worcester County Revisited: Toxic Pollution and Academic Performance") found that area **minorities experience 1.43 times the exposure risk** to toxics that whites do, contributing in part to the academic performance gap. Illustrating this correlation, the Canterbury School (two blocks from the District 4 ABI's **Crompton & Knowles/Grand St.** complex) ranks 658th highest of 668 Mass. elementary schools in failure rate for the state's 2017 standardized science test, with troubling school test scores also present in most other ABIs. As noted elsewhere, **14 of the 15 ABIs** contain state **environmental justice** communities, reflecting the outsized environmental risks to these areas.

1.b.iii. Cumulative Public Health Issues (5 points)

Public health indicators show **associations between disease and brownfields-related environmental factors** such as lead paint, soil contaminants and elevated air pollution. All of these are concentrated disproportionately in older industrial neighborhoods like the ABIs, as are **vulnerable populations such as young children**. According to the 2015 Greater Worcester



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Community Health Assessment, Worcester's **pediatric asthma hospitalization rate is double the state rate** (1,526 to 768 per 100,000 visits), reflecting both high local air pollution and substandard housing stock. Aging housing stock as noted in 1.b.ii likely also accounts for much of the lead poisoning hazard, though contaminated land also plays a role through various exposure pathways. According to the state Bureau of Environmental Health, **elevated pediatric blood lead levels** (>5 ug/dL) exist throughout the CMRPC region, with the 2015 county rate of 25 per thousand well above the state rate of 19. Communities hosting ABIs are much harder hit. **Elevated lead rates are as high as 34 in Worcester and 43 in Southbridge.** Though there is insufficient data for the Census tract containing the **Crompton & Knowles/Grand St.** complex, multiple neighboring tracts in the Worcester **District 4 ABI** meet or exceed **110 affected children per thousand.** This alarmingly high level (11% of all children) highlights the need for **new and rehabilitated housing** that is affordable for low-income families.

1.c. Financial Need

1.c.i. Economic Conditions (5 points)

CMRPC is a state-enabled special government district with 32 staff that provides planning and related services to a defined region of 40 cities and towns. It is not a county government and it has no ability to bring in revenues through taxes or sales of property. Aside from a **voluntary 27-cent per capita** contribution from its member communities which provides \$151,000 a year, **CMRPC is entirely grant supported.** CMRPC's first and only EPA assessment grant ended several years ago and subsequent applications have been unsuccessful, leaving nearly all of our communities without access to assessment funds. We have worked with various partners since the launch of our brownfields plan to develop a pipeline of sites that are ready for assessment and/or cleanup. **More than 60** are now in the queue and we have no funds to assist them. This EPA assessment grant will be **a critical step toward implementation of the plan.**

Communities with ABIs face economic disadvantages as well, starting with small size. With the exception of Worcester, all 12 towns containing ABIs are **18,000 or smaller** in population, and three fall **below 6,000.** All but two ABI-containing municipalities are below the state median in per capita income, with **three in the poorest 29** of the state's 351 municipalities. There have been **14 FEMA-declared disasters** in the region since 2010, each affecting all or most ABI communities, straining budgets. Thirteen of the 15 ABIs are located in or west of Worcester, away from the thriving Boston real estate market to the east that props up local tax bases and spurs private redevelopment of brownfields. Worcester, home to the **District 4 ABI**, has budget challenges despite its large size. About **29% of all property in the City is tax-exempt** due to ownership by government or non-profits, compared to the 13% state average. All ABI communities face long-term liabilities for employee retirement; Worcester alone is **\$722 million** in arrears. In most ABI communities revenues are just now recovering to pre-recession levels.

1.c.ii. Economic Effects of Brownfields (10 points)

Brownfields cause or contribute to each of the conditions outlined above, and the scale of the problem is daunting. A GIS analysis in CMRPC's brownfields plan finds that the almost **1,200** reported Chapter 21E contaminated sites in the 15 ABIs impact over **15,000 acres** of property. The assessed value of these properties is **more than \$2.1 billion.** Although the majority of these sites have been cleaned up, the **perception of contamination** often lingers, dragging down land values. Academic research (Leigh & Coffin, 2010, "Modelling the relationship among brownfields, property values, and community revitalization" etc.) has shown that the presence of blighted brownfields **indirectly reduces nearby property values**, especially where brownfields



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are clustered in depressed areas, as in the 15 ABIs. A standard method for determining the financial viability of municipalities is the equalized valuation (EQV), which captures the value of all taxable real property. For FY 2016 Massachusetts had a **statewide EQV of \$165,057** per capita. Municipalities with ABIs fared poorly at **only \$79,887** overall. **Worcester** (\$66,733) and **Southbridge** (\$58,195) fared **among the lowest in the state**. These numbers reflect the drag that brownfields, tax-takings, foreclosures and other non-revenue properties have on local finances.

Because of blighted properties that degrade the local tax base, Worcester and most other ABI-containing communities **are forced to carry very high tax rates**. Worcester's commercial rate, for example, is **nearly triple the rate** in Shrewsbury, its most populous suburb (**\$32.93 vs. \$12.83** per thousand). Employers are understandably tempted **to leave high-tax communities** where commercial real estate is often encumbered with **real or perceived contamination** for **greenfield** sites in low-tax suburbs. For example, 11 Worcester manufacturers have closed, moved or had major layoffs since 2009, leaving 780 jobless. This cycle of disinvestment **disproportionately affects low-income residents** who rely on tax-dependent schools and social services. It also shifts jobs away from population centers like the 15 ABIs to suburban areas without transit. The disruption is most acute in low-income urban areas like the **District 4 ABI** where access to cars is minimal. Worcester's Youth Violence Prevention Initiative cites youth unemployment as a leading cause of gang violence and **life-long poverty** in the neighborhood.

The **Crompton & Knowles** complex illustrates the economic drag a single brownfield can have. Its **93 Grand St.** mill sat abandoned for 35+ years before it was cleaned up using EPA funds and rehabilitated as low-income housing. It and other blighted parcels at the complex dragged down area property values and left a gap in the urban landscape, damaging nearby retail business. In 2015 the cleaned but pre-rehab property was valued at \$1.4 million. Following reconstruction in 2017, the **assessment jumped to \$7.2 million** and increased annual property **tax revenues by \$110,000/year**. The City of Worcester **lost nearly \$4 million in potential taxes** from a single property in the years it sat vacant. Two additional vacant parcels in the complex, including **92 Grand St.**, require assessment before redevelopment can proceed. Without redevelopment of more properties like these, District 4 and the other ABI communities will continue to struggle.

2.a. Project Description, Redevelopment Strategy, & Timing and Implementation

2.a.i. Project Description and Alignment with Revitalization Plans (12 points)

As a regional planning agency, CMRPC strongly believes that resources should be allocated based on strategic planning. With guidance from our regional Brownfields Advisory Committee (BFAC) and funding from a state grant, over the past year CMRPC developed a **regional brownfields plan** rooted in EPA's **Area-Wide Planning** approach. The plan is intended to 1) **identify neighborhood-scale areas** within the region where brownfields assistance resources are needed most, and 2) **provide neighborhood-wide and site-specific strategies** for fostering revitalization of brownfields within these areas. **15 'Areas of Brownfields Interest' (ABIs)** were ultimately identified through analyses of historic land use, reported and suspected contaminated sites, prioritization in regional land use plans, and presence of environmental justice populations. These former industrial and commercial districts range from gritty mill villages to sprawling urban districts; all lack the resources needed to revitalize brownfield sites.

This EPA assessment grant will be a critical step toward **implementation** of the plan. If funded, CMRPC intends to **target at least 80%** of available resources **in the ABIs**, with the remainder available for key sites anywhere in the region. With BFAC support, CMRPC has already prioritized the **92 Grand St.** in Worcester's **District 4 ABI**. Other sites will be selected based on



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several factors that emerged from the BFAC during the planning process, including health and environmental factors, transit access, and **realistic** redevelopment plans that focus on affordable housing, job creation and quality-of-life amenities (see 2.a.iii for more on site selection).

CMRPC's proposed program will produce site assessments and cleanup plans for properties with real or perceived contamination by petroleum and hazardous substances. CMRPC's Regional Services staff will oversee the proposed program – see sections 2.b and 5.b for our team's proposed workplan and qualifications. Our financials staff will complete drawdowns and contractor payments **at no cost to the grant**. QEPs will be procured to conduct the assessments and cleanup plans and support site selection and reporting activities. Strategic oversight and site selection guidance will be provided by CMRPC's standing advisory committee (BFAC). Grant tasks will include 1) Cooperative Agreement oversight, 2) Site selection & outreach, 3) Site assessments, and 4) Re-use & cleanup planning. These tasks are further detailed in 2.b. The program is **focused primarily on Phase II assessments**, with \$204,000 of the requested \$300,000 slated for Phase IIs. Overall, we expect to complete **9 Phase I** and **6 Phase II** assessments, followed (where necessary and affordable) by **3 reuse/cleanup plans**. Work products will be split roughly 2/3 on hazardous substances sites and 1/3 on petroleum sites.

CMRPC commits to supporting **equitable development** outcomes. Nearly 11% of households in ABI neighborhoods (and over 17% in Worcester's District 4 ABI) earn less than \$10,000/year, compared to just 6% for the region as a whole. Fourteen of the 15 ABIs contain state-designated **environmental justice** areas. By focusing our brownfields effort in the ABIs, CMRPC intends to work **inclusively** to remove barriers facing underserved populations who bear disproportionate environmental risks, as noted in 1.b.ii. CMRPC will partner with the **Main South CDC** by funding assessment of the **92 Grand St.** property (also see 2.a.ii). The CDC's plan for the site includes **49 units of mostly affordable rental housing** in a high-poverty neighborhood where 82% of households are renters and 91% of housing units were built in the 1970s or before. This **transit-accessible** project will help mitigate the adverse effects of **gentrification** associated with several large market-rate apartment projects underway in nearby downtown Worcester. Our site-selection criteria will likewise emphasize equitable projects in the ABIs (see 2.a.iii).

2.a.ii. Redevelopment Strategy (5 points)

The 15 ABI target neighborhoods are located in municipalities as small as 3,000 residents and as large as 185,000. Despite this range, they share a common need for desirable **affordable housing**. As noted in sections 1.a and 1.b, ABI residents are disproportionately renters (63%) who reside in aging housing built before lead paint was banned in the late 1970s (83%). Despite living in often substandard homes, residents struggle to afford rent, with almost **25% of ABI residents living in poverty**. To address this need, CMRPC will prioritize assessments of sites planned for **affordable housing** and related **quality-of-life** amenities. As noted above, we will join with the **Main South CDC** to complete a site assessment pursuant to **49 units of mostly affordable rental housing** at **92 Grand St.** Predevelopment and partial construction **funds are already in place** for revitalization of the 2-acre property – see 2.c for details. Site-selection criteria for additional projects will also emphasize affordable housing (see 2.a.iii).

Each of the 15 ABIs is located within its community's developed core. **All 15 are served by existing infrastructure** (water, sewer, electric and telecom), and all but one have natural gas. Fixed-route transit (bus) service is available in 9 of the 15 ABIs. Several others have on-call senior shuttles and paratransit. Main South CDC's **92 Grand St.** site will use existing utilities and is transit-accessible. Access to infrastructure will be a site selection criterion (see 2.a.iii).



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2.a.iii. Timing and Implementation (13 points - below)

a) Contractor Procurement (3 points)

Upon award of the grant and completion of startup requirements (workplan, etc...), CMRPC's brownfields team will initiate a Request for Qualifications (RFQ) process to competitively select at least two Qualified Environmental Professional (QEP) firms, in our case MassDEP-approved Licensed Site Professionals (LSPs). Having two firms under contract will ensure that concurrent assessments can be **completed rapidly** and **costs can be controlled**. Based on our proposed staff lead's brownfields procurement experience, we expect the process from RFQ development, advertisement, proposal review, and interviews to contract finalization to take about 10 weeks. Selected advisory committee (BFAC) members will assist with proposal review and interviews to ensure that a broad spectrum of regional interests is represented in the procurement process.

b) Site Inventory, Identification, Prioritization and Selection Process (5 points)

CMRPC's regional brownfields plan will serve as the initial site inventory for the program. Within the 15 ABIs, the plan identifies **51 brownfield sites** in need of assessment and/or cleanup, as well as **14 sites elsewhere** in the region. CMRPC will invite nominations for assessment help at these and other eligible sites on a rolling basis. Nominations may be submitted by **municipalities, community-based organizations, and private landowners or developers** with written municipal support. Upon receipt, nominations will be reviewed by CMRPC staff and the QEP for completeness, potential eligibility, and assessment needs and costs. Assistance with nomination materials is available for entities that lack the capacity or experience to do so. For viable projects that are within the available program budget, eligibility forms will then be submitted to EPA and (for petro sites) MassDEP for approval. Completed, eligible nominations will be reviewed by the BFAC; extra meetings will be convened if necessary for emergency or other time-sensitive projects. Nomination materials developed for CMRPC's FY09 assessment program will be updated for use in the FY18 program. The nomination form requests information on site and applicant eligibility, project need, reuse plan, requested scope of work, site access, past assessments (if any), and community support. We expect initial sites to be approved and underway **within 4-5 months of grant award**.

With BFAC input, CMRPC recently updated its site prioritization and selection procedures. Threshold criteria will include EPA/MassDEP eligibility approval, availability of funds, location within an ABI (80%+ of funds are allocated to sites in the ABIs), and site access. Prioritization criteria will include **location factors** (sites within an ABI, environmental justice area, area with existing infrastructure, and/or transit-accessible area), **redevelopment/reuse factors** (realistic, preferably **funded** plan for affordable housing (the highest weight), economic development/job creation (including links to **job training** programs), health/safety, environmental protection, and/or community amenities), **community support**, and **project timing**. Using these criteria, each site will receive an overall score following discussion at a BFAC meeting. Sites with the highest scores will receive assistance if funds are available at the time of approval or if useful assessment can be completed with partial funds. Note that the **Main South CDC's 92 Grand St.** site received contingent approval by the BFAC at its October 2017 meeting, assuming award of the grant, a site access agreement, and formal EPA site eligibility approval.

c) Obtaining and Securing Site Access (5 points)

We do not anticipate problems obtaining site access because other sites will not be approved for assessment without a written access agreement in place. CMRPC staff will consult with agency counsel **at no cost to the grant** to update the access agreement used with our FY09 assessment



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program. In cases where property owners are hesitant to grant access, CMRPC staff, our QEP and (where appropriate and available) MassDEP legal staff will meet with owners to discuss the benefits and risks of allowing access for assessment work. In cases of blight or hazardous conditions, state or local health or environment agencies may be able to grant access. In the case of **92 Grand St.**, an informal agreement is in place; the **Main South CDC** expects to close on the property as soon as January. A formal agreement will be signed following the acquisition.

2.b. Task Descriptions and Budget Table

2.b.i. Task Descriptions (15 points)

Task 1: Cooperative Agreement Oversight – CMRPC's brownfields team will oversee the assessment program, including **procurement and management of contractors** (with Davis-Bacon compliance and S.106 historic review, where required), **reporting quarterly** to EPA (including MBE-WBE), updates of **ACRES**, and monitoring of costs under CERCLA 104(k) to ensure that activities are eligible for funding. **Staff effort for all tasks is expected to be distributed 2/3 to hazardous substances oversight and 1/3 to petroleum.** See 5.b for details on staff roles. Overall personnel costs will total \$9,750 plus \$4,500 for eligible fringe at 46.16% of direct. Personnel costs for the Principal Planner (program lead) are budgeted at \$8,000 (6+ hours/month x 36 months = 229 hours at \$35/hour) and for the Regional Services Manager are \$1,750 (1+ hour/month x 36 months = 43 hours at \$41/hour). Financial oversight (drawdowns, invoice processing) will be handled by our financials team in-kind **at no cost to the grant.** Travel costs are included at \$4,095. This includes the cost for one staffer to attend two brownfields conferences during the grant (est. \$2,500 total) plus mileage within our 40-town region for oversight of all tasks and travel to brownfields training events within the state (~3,000 miles at \$.535/mile = \$1,595). QEP support under this task (\$3,000) will be provided for some technical elements of quarterly reporting and ACRES. Supplies (\$1,500) will include materials and technology for public meetings (graphics, handouts, audience response gadgets/app, etc...).

Task 2: Site Selection & Outreach – Task 2 focuses on outreach to attract potential assessment sites, site selection, and updates to site abutters during assessment and planning work. Awareness will be built through regional coordination, partnership development, media publicity and **two regional forums**. CMRPC, working through the BFAC, will establish or enhance community-based partnerships, conduct staff or **public outreach meetings** with potential applicants (where requested), update and distribute **program information**, and encourage media placement. Staff, QEPs and (where needed) contract translators will attend BFAC, regional and site-specific **public meetings** as part of the outreach process. Site-specific meetings will be held when requested by the project proponent or if imminent health threats are found. QEPs will consult EPA/MassDEP on **project eligibility** and will provide an assessment **scope** and **cost estimate** for the BFAC's use in scoring nominations. CMRPC staff will convene BFAC meetings and lead discussion on the formal selection of sites; if needed, we will work with landowners on **access** issues. Personnel costs are for the Principal Planner, budgeted at \$3,000 (2+ hours/month x 36 months = 86 hours at \$35/hour) plus \$1,385 fringe. QEP support as described here totals \$9,000.

Task 3: Site Assessments – The core of the program. Task 3 includes a kickoff meeting or conference call for each project, assessment field work, laboratory analysis, reports and state VCP submittals by the QEPs (reviewed by CMRPC and the project proponent). Staff work will include oversight of contractors, review of contractor submittals, and status updates to the host community (public meetings will be held under Task 2, as will any needed translation of assessment results). Coordination with EPA will be required during **QAPP** development, and



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MassDEP will be asked to comment on any submittals at complex or sensitive sites. Phase Is will comply with ASTM's E-1527-13 **AAI** standard. Phase IIs including soil, indoor air, groundwater and any hazardous building materials sampling will conform to applicable Massachusetts and EPA regulations. Personnel costs for the Principal Planner are budgeted at \$2,000 (<2 hours/month x 36 months = 57 hours at \$35/hour) and for the Regional Services Manager are \$1,000 (<1 hour/month x 36 months = 24 hours at \$41/hour). Total fringe is \$1,385.

Our QEPs will complete roughly **9 Phase I** and **6 Phase II** assessments. In each case, 2/3 of the work will be for hazardous substances and 1/3 for petroleum sites. Based on our FY09 assessment program and recent discussions with state agencies and QEPs, we expect that Phase Is will average **\$4,000**. Phase II costs are more variable but we anticipate an average of about **\$34,000**. Actual costs will depend on each site's needs, initial regulatory status, and program budget considerations. Our program is **focused primarily on Phase II assessments**, with \$204,000 in contractual costs slated for them compared to \$36,000 for Phase Is. Community outreach related to assessments, including any translation, will be conducted under Task 2.

Task 4: Reuse & Cleanup Planning – Task 4 includes costs associated with developing reuse and cleanup alternatives. In some cases, these will take the form of visioning plans that seek to build community consensus on site reuse options based on assessment results. In cases where a clear redevelopment plan is in place, they will align more with EPA's ABCA process, providing a summary of remedial costs, benefits and timelines. We anticipate our QEPs will complete **3 reuse/cleanup plans** at \$5,000 each. Public planning meetings, including any required translation, will be covered under Task 2. Personnel costs are for the Principal Planner, budgeted at \$3,000 (2+ hours/month x 36 months = 86 hours at \$35/hour) plus \$1,385 fringe.

2.b.ii. Budget Table (5 points)

BUDGET TABLE		Task 1: Cooperative Agreement oversight	Task 2: Site selection & outreach	Task 3: Site assessments	Task 4: Reuse & clean-up planning	SUB- TOTALS
Cost Category	Contaminant Type					
Personnel	HazSubs	\$6,500	\$2,000	\$2,000	\$2,000	\$12,500
	Petroleum	\$3,250	\$1,000	\$1,000	\$1,000	\$6,250
Fringe (46.16%)	HazSubs	\$3,000	\$923	\$923	\$923	\$5,770
	Petroleum	\$1,500	\$462	\$462	\$462	\$2,885
Travel	HazSubs	\$2,730	\$0	\$0	\$0	\$2,730
	Petroleum	\$1,365	\$0	\$0	\$0	\$1,365
Supplies	HazSubs	\$1,000	\$0	\$0	\$0	\$1,000
	Petroleum	\$500	\$0	\$0	\$0	\$500
Contractual	HazSubs	\$2,000	\$6,000	\$160,000	\$10,000	\$178,000
	Petroleum	\$1,000	\$3,000	\$80,000	\$5,000	\$89,000
SUBTOTALS	HazSubs	\$15,230	\$8,923	\$162,923	\$12,923	\$200,000
	Petroleum	\$7,615	\$4,462	\$81,462	\$6,462	\$100,000
TOTAL		\$22,846	\$13,385	\$244,385	\$19,385	\$300,000

Note: no equipment costs are requested; budget includes only grant-eligible direct costs

2.c. Ability to Leverage (5 points)

Anticipated non-EPA funds leveraged by the proposed program are summarized in the table below. Additional leveraging is expected through private developers, municipalities, and partner organizations following completion of the site selection process. For example, under CMRPC's FY 2009 assessment grant, EPA funding supported some **\$2.5 million** toward cleanup and redevelopment of assessed sites (also see 5.d.i.1.). Documentation is attached for secured items.



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Source	Purpose/Role	Amount (\$)	Status
CEDAC	Pre-development and acquisition costs for 92 Grand St. project (to Main South CDC)	\$1.1 million max.	Secured
HUD (HOME program)	Construction costs for 92 Grand St. project; contingent on completion of acquisition and predevelopment phases (to Main South CDC via City of Worcester)	\$825,000 max.	Secured
Clark University	Pre-development carrying costs for 92 Grand St. project (to Main South CDC)	\$500,000 max.	Secured
Main South CDC	In-kind staff time to manage 92 Grand St. project	In-kind	Secured
CMRPC	In-kind staff time for assessment grant's financials; counsel update of model site access agreement; possible DLTA/LPA allocation for additional program staff time	In-kind (\$2,000 est. value)	Secured/ Pending
MassDEP, MassDevelopment, Worcester BDC	In-kind staff time for technical assistance and outreach above and beyond usual Brownfields Advisory Committee (BFAC) responsibilities	In-kind	Secured
Boys & Girls Club	In-kind event space for 92 Grand St. public event(s)	In-kind	Secured
MassDevelopment	Possible cleanup, redevelopment and/or supplemental assessment funds through recoverable grants/loans for eligible brownfields with business creation potential	TBD	Potential
City of Worcester	Possible CDBG and/or tax incentives for remediation or redevelopment of Worcester sites, incl. 92 Grand St.	TBD	Potential
Mass. DHCD	Possible competitive state CDBG funds for cleanup or supplemental assessment of eligible blighted sites	TBD	Potential
Municipalities	Possible local tax incentives (TIF, DIF, abatements, etc.)	TBD	Potential

3.a. Engaging the Community

3.a.i. Community Involvement Plan (10 points)

Community engagement starts with CMRPC's standing **Brownfields Advisory Committee (BFAC)**. Composed of staff from six local governments, two state agencies, and several community-based organizations with strengths in **environmental advocacy**, **economic development** and **community development**, the BFAC will serve as a key conduit for disseminating program information to a **diverse user group** and the **ABI neighborhoods**. The BFAC will also play a key role by helping to **review site nominations**. Its membership may be broadened during the grant as **new partnerships** emerge through outreach. All BFAC meetings – roughly three per year – are posted and **open to the public**. In coordination with the BFAC, CMRPC will issue a press release notifying the region of the launch of our assessment program. Information will be issued through our **website**, municipal and brownfields **email blast lists**, **social media** (Facebook, Twitter) and BFAC **partners' contact lists**. We will request an article in the *Worcester Telegram* and other **media**. In order to **engage with ABI neighborhoods** effectively, a contractor will **translate** the media release and basic program information to **Spanish**, the major foreign language in almost all the ABIs, for parallel distribution. Materials will be updated and re-distributed periodically throughout the grant period. CMRPC staff will attend events run by key partner organizations and other stakeholders (e.g., the **Worcester Business Development Corp.**) to ensure that awareness of the assessment program is high.

Early in the grant period, CMRPC and its partners will hold **two regional public forums** in **ABI neighborhoods**, one each during the work day and the evening to **maximize public access**. Meetings will be held in transit- and ADA-accessible locations and will include childcare if possible. We will summarize our assessment program and its nomination process, other



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brownfields resources, and discuss potential sites. CMRPC will work with municipal staff, elected officials, and partner community organizations to publicize the meetings to residents and other key groups, and media placements will be sought. **Live translation** will be obtained for any meeting held in an area with substantial foreign language speakers (such as Worcester or Southbridge ABIs) or if suggested via forum pre-registrants or by partner organizations. Where requested, we will also attend public or staff-level meetings with **potential program applicants** to help communities understand the nomination process, site eligibility, and liability concerns.

3.a.ii. Communicating Progress (5 points)

A **public meeting** will be held for **each project** if requested by the project proponent. At the proponent's preference, meetings will be held either prior to site work to outline the assessment **project's work plan and schedule**, or afterward to **present results** and address **neighborhood concerns**. Meetings will account for **language, cultural and access** differences and will be held in the project area wherever possible; if communication barriers occur, we will **make accommodations** as needed, especially in ABIs with language concerns. Follow-up meetings will be held for sites where **imminent hazard conditions** are found or where **reuse visioning** is part of the project. We will coordinate with individual proponents to **identify the best approach for publicizing** each site-specific meeting; for example, social media may work in one community, while traditional media or abutter mailings may be more effective in another. One or more project forum will be held at the **Boys & Girls Club** of Worcester, just one block from the **Main South CDC's 92 Grand Street** project. MassDEP and/or local boards of health will be strongly encouraged to attend where site-specific **public health** concerns are apparent.

As each assessment starts, **schedules, progress and deliverables will be tracked by CMRPC**. These will be communicated to the public on CMRPC's **website** and linked to those of our partners, and periodic updates will be shared on **social media**. Project web pages will be designed to be easily printable as mailer or flyers so that abutters can be updated directly by the project proponent. Updates will be sent to the relevant **municipal government** for distribution through its own postings/web page, and to **partner community groups** for distribution via their channels. Project progress reports will also be presented at **public BFAC meetings**.

3.b. Partnerships with Government Agencies

3.b.i. Local/State/Tribal Environmental Authority (5 points)

The Mass. Department of Environmental Protection (MassDEP) **regulates the state's Chapter 21E voluntary cleanup program**. Under 21E's privatized system, QEPs registered as Licensed Site Professionals (LSPs) conduct assessment and cleanup work under state regulations. Their work is periodically audited by MassDEP staff. CMRPC has collaborated with and will continue to work with MassDEP to determine **petroleum site eligibility** and to make sure brownfield landowners (often towns or cities) understand the regulatory process and any liability issues. When reportable contamination is found, sites are **reported** to the 21E program. **CMRPC and MassDEP regularly meet jointly with municipalities** to help build local capacity and develop revitalization strategies for difficult brownfields. MassDEP's regional brownfields coordinator **serves on our Advisory Committee (BFAC)** and will continue to do so if this grant is awarded.

3.b.ii. Other Governmental Partnerships (4 points)

CMRPC has other strong partnerships at the state and federal levels and in our 40 member municipalities. **MassDevelopment**, operator of the state Brownfields Redevelopment Fund, is a key collaborator. Aside from funding redevelopment and business-oriented remediation projects in the region, they are a vital liaison to the developer community and finder of potential



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assessment sites; **MassDevelopment serves on our BFAC**. The Mass. **Dept. of Housing and Community Development** (DHCD) has been a key partner by providing CDBG funds for remediation and redevelopment in small towns; CMRPC has a strong long-term relationship with DHCD through management of local grants. **Municipalities** are our most frequent collaborators, providing local knowledge, community contacts, and vast experience with redevelopment projects. **Officials from the City of Worcester and several other communities serve on our BFAC**. Worcester in particular is a key partner for the Main South CDC's **92 Grand St.** project, providing leadership, community engagement support and potentially cleanup resources. We have contacts with local **boards of health** and the multi-town **Central Mass. Health Coalition** who can help communicate any health risks that are uncovered during assessment. While we do not currently have EPA funding, we remain engaged with the **EPA Region 1 brownfields team** through training events and ACRES updates for projects funded in our FY09 grant.

3.c. Partnerships with Community Organizations

3.c.i. Community Organization Descriptions and Roles (5 points) and

3.c.ii. Letters of Commitment (4 points)

As a regional entity, CMRPC partners with several key state, regional and local organizations. We expect that outreach and momentum during the grant period will lead to further partnerships. Letters of commitment from the organizations listed below are attached to this proposal.

Organization	Organizational Mission	Commitment of Services
Main South Community Development Corporation (CDC)	To improve quality of life through creation of safe, affordable housing and livability improvements for low-to-moderate income individuals; to support business and economic development benefitting neighborhood residents; and to foster neighborhood pride and commitment	<ul style="list-style-type: none"> • Lead 92 Grand St. project: • Project management • Pre-development and construction funding • Community engagement • BFAC member
Regional Environmental Council	To build healthy, sustainable and just communities through grass roots programs; to promote environmental and food justice	<ul style="list-style-type: none"> • BFAC member
Worcester Business Development Corporation	To serve as an innovative and leading force in the economic development of Worcester and the region through targeted development resulting in job creation and tax base expansion	<ul style="list-style-type: none"> • BFAC member • Hold program information session for business leaders • Outreach to contacts
Worc. Regional Chamber of Commerce	To support existing businesses and economic development in the area by advocating for small business; 2,300 members in 35 communities	<ul style="list-style-type: none"> • Outreach to business community
Blackstone Heritage Corridor	To promote the 25-town Valley's historic, natural, & recreational resources via economic development, conservation, community planning, and education	<ul style="list-style-type: none"> • BFAC member
Mass. Audubon Society	To protect nature via community engagement in planning, education and resource conservation	<ul style="list-style-type: none"> • BFAC guidance
Boys & Girls Club	To help youth develop the qualities needed to become responsible citizens and leaders	<ul style="list-style-type: none"> • Host public meeting(s) for 92 Grand St. project

3.d. Partnerships with Workforce Development Programs (2 points)

Unfortunately, there are no current brownfields job training grantees in the area. Through our regional economic development strategy process, CMRPC has a relationship with the **Central Mass. Workforce Investment Board** (CMWIB), the region's workforce development agency.



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As assessment projects move toward redevelopment and job creation CMRPC will coordinate with the CMWIB to make sure they are aware of upcoming opportunities, especially those where residents of ABI neighborhoods can benefit. CMWIB's "Building Pathways" pre-apprenticeship in particular prepares low-income younger adults for construction trades that can benefit from brownfields redevelopments like the **92 Grand St.** project. Projected **job creation will be a criterion** in site selection under this grant; projects that demonstrate coordination with the CMWIB or other training centers such as Quinsigamond Community College will receive extra consideration. Note that local hiring and procurement stipulations are illegal under state law.

4.a. Welfare, Environmental and Public Health Benefits (13 points)

Reduction of threats to human health, welfare and the environment is a primary benefit of the proposed assessment program. This is particularly true in the 15 ABIs. As discussed in section 1, ABI neighborhoods are **disproportionately affected by contaminated sites** of all types and other environmental threats such as **deteriorated housing** and **air pollution**. Nearly all are state **environmental justice** communities, and ABIs tend to be home to concentrations of **vulnerable populations** like young children. Assessment of key brownfields in ABI neighborhoods will in many cases lead directly to cleanup and revitalization. Cleanup and redevelopment of blighted sites in turn will have manifold **health and welfare benefits: exposure** to hazardous substances, petroleum and unsecured sites **will be minimized; crime** and quality-of-life **nuisances** (vandalism, illegal dumping, etc.) **will be reduced; positive street activity will increase;** and **neighborhood pride** and investment **will move upward**. With assessments that lead to production of new **affordable housing, health improvements** from reduced exposure to lead paint and airborne triggers like mold, rodents and dust mites will lower childhood **blood lead** and **asthma** rates. CMRPC's proposed site selection criteria **emphasize projects with realistic reuse plans tied to health and welfare benefits**. We believe this approach will maximize the positive long-term outcomes of the proposed assessment program. Our commitment to these outcomes is demonstrated by previous approval of Main South CDC's **92 Grand St.** affordable housing project as the first project to be assessed on award of the grant.

Environmental benefits are also expected through better understanding the nature and extent of site contaminants. Soil, water, air, indoor air and/or building **contaminants will be reduced** as assessed sites move to cleanup and reuse. Because the 15 ABIs are in **already-developed** urban or village center locations, redevelopment of infill sites like **92 Grand St.** in Worcester will **reduce pressure on** outlying **greenfield properties** that may have vulnerable, intact ecosystems. Our focus on existing built areas also aligns with **smart growth** practices by fostering increased use of **transit** and **existing infrastructure**. Overall, we estimate that **10 to 15 acres** of now-blighted land will be moved toward environmental restoration using EPA funds.

4.b. Economic and Community Benefits (12 points)

Through the planned **9 Phase I** and **6 Phase II** assessments, we expect **5 to 7** vacant and underutilized parcels to be made **ready for cleanup or reuse**. CMRPC's proposed site selection criteria emphasize projects where, as much as possible, post-redevelopment **economic benefits extend to many constituencies** in the 15 ABIs. For the business community, parcels will be made ready for **business and housing**. For cities and towns that contain ABIs, sites for **business attraction, expansion and retention** efforts will be made more attractive via reduced uncertainty. Local **tax bases will grow through increased land values** as sites are cleaned and revitalized, of particular benefit to communities with very limited tax bases like Worcester and Southbridge. Increased property values will benefit not only municipalities and site owners; the



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reduced perception of contamination and neighborhood blight will **indirectly raise values** at nearby properties, creating opportunities for echo development. Pressure on municipal **tax rates will be reduced** as now-unproductive properties move back onto the tax rolls, eventually creating a **positive feedback loop** for business. For residents in ABI neighborhoods, new **job opportunities will** be created. And by emphasizing affordable housing in our site selection, ABI residents will benefit financially from **modern, healthy affordable housing for low-income families**. Although few (if any) individual sites in the program will match the economic impact of the 93 Grand St. property noted in section 1.c.ii, we expect that **about \$5 million dollars** will be added to local tax assessments through projects aided with this grant. Applying the same per-unit increase to the Main South CDC's planned **92 Grand St.** project as was achieved at 93 Grand St. (but scaled to fit the CDC's 49-unit housing plan), we estimate a **\$2.7 million increase** in property value and a **\$52,000/year** tax bump from this single project, when built. Job creation is notoriously difficult to quantify, but a review of successful area brownfield projects supports a program-wide estimate of **100 temporary construction jobs** and **100 to 150 permanent jobs**.

Non-economic community benefits will be promoted through the site selection criteria, which include quality-of-life topics like **greenspace creation** and **community amenities**. Greenspace reuses may be part of a commercial project or a dedicated recreational space. Since defunct mills are often sited along rivers like the Blackstone, **water quality** may benefit and **recreational access** may improve through revitalization of riverfront sites. And because brownfields are typically located in **town or neighborhood centers**, their cleanup can provide municipalities with new opportunities to reactivate these **critical community spaces** through **implementation of local master plans** and open space plans, which in ABI-containing communities are very often complicated by blighted properties. Municipal town center projects typically include parks or new municipal facilities. However, the main non-economic benefit expected is through **support of non-profit partners**, especially those like **Main South CDC** that develop affordable housing in high-need ABIs, such as the **92 Grand St.** project at the Crompton & Knowles complex. Affordable housing developed in strategic locations **helps to mitigate gentrification**, fostering stability in cohesive, culturally distinct ABI neighborhoods like Worcester's District 4.

5.a. Audit Findings (2 points)

CMRPC has not had adverse audit findings.

5.b. Programmatic Capability (23 points)

Principal Planner **Andrew Loew** will be the primary contact with responsibility for cooperative agreement oversight, reporting, and oversight of most of the assessment projects. Andrew was the Assistant Statewide Brownfields Coordinator at MassDEP for four years. He assisted communities with capacity building for brownfields, obtained and helped oversee an EPA coalition assessment grant, and developed MassDEP's brownfields tracking system. He later managed EPA brownfields AWP, assessment and RLF grants at the Pioneer Valley Planning Commission in Springfield, Mass. Andrew is currently leading CMRPC's regional brownfields planning process. Andrew is a state-certified public purchasing official and will lead the QEP procurement process. **Trish Settles**, Regional Services Manager, has worked at CMRPC for nearly ten years and helped oversee its FY09 assessment grant. Trish previously worked as a geologist for a hazardous waste cleanup firm and adds both technical knowledge and program oversight redundancy to the team. Trish will oversee individual assessment projects. As with Andrew's hiring in 2016, CMRPC has demonstrated the ability to recruit qualified brownfields staff as needed. The core brownfields team above is supported by CMRPC's financial staff.



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Janet Pierce has served as CMRPC's Executive Director for two years after seven as its Business Manager. She has experience making drawdowns in EPA's online financial system and will lend her experience to **Dianna Provencher**, current business manager. With 15 years' experience in grant financials, she will conduct draws, contractor payments and financial reporting. The financial staff's time will be contributed in-kind **at no cost to the grant**. A **contractor** will be hired to **translate** documents and events as per section 3.a. In 1993, MassDEP's Chapter 21E voluntary cleanup program was privatized. CMRPC will contract state-certified Licensed Site Professionals (LSPs) to conduct all sampling, analysis and regulatory submittals. LSP services will be procured under state law using federal procurement standards.

5.c. Measuring Environmental Results: Anticipated Outputs & Outcomes (5 pts)

Immediate outcomes will be measured in terms of sites assessed and cleanup plans produced and progress toward the workplan goals stated in 2.a. **Long-term outcomes** are expected to include cleanups that result in protection of health and/or the environment and lead to redevelopment. **Redevelopment outcomes** will be tracked via cleanup and redevelopment dollars leveraged, jobs created and retained, greenspace and housing added, and local tax base increases. **Outputs** will include assessment/cleanup planning **reports** (and possibly closeouts under the state VCP) by our QEPs, status updates and presentation materials to keep community partners updated, quarterly reports to EPA, environmental and redevelopment data input to ACRES, and internal progress/invoice tracking data. We will provide **success stories** to EPA on request. CMRPC has an annual allocation of technical assistance time dedicated to each member community which will be used, in part, to **track outcomes even after close of the grant**.

5.d. Past Performance and Accomplishments

5.d.i.1. Accomplishments (5 points)

CMRPC received a \$400,000 assessment grant in FY09. \$3,000 that had been held in reserve for potential project overruns was not drawn down. Sixteen sites in 10 communities were assisted by the grant. **16 Phase I** and **4 Phase II ESAs** were completed, exceeding the workplan's goals of 10 Phase Is and 3 Phase IIs. One supplemental hazardous building materials study and one cleanup plan were also completed. The projects supported through EPA's assistance **leveraged about \$2.5 million in private and public investment**, increased municipal tax bases by thousands, created jobs, and strengthened the health and welfare of our communities. To illustrate, Brookfield recently completed a \$1.6 million police station at the 3-5 Prouty Street site; North Brookfield used information from its supplemental assessment to win \$500,000 in state funds to stabilize its historic Town House; in Worcester, the Maki Electric site sold for \$275,000 and was redeveloped into an architectural restoration firm. Capacity for brownfields projects was expanded in communities aided through the FY09 grant, with local partners in Worcester, Brookfield, Hardwick, North Brookfield and other towns later winning brownfields funds through EPA and state grants/earmarks, some with CMRPC aid and some independently.

5.d.i.2. Compliance with Grant Requirements (5 points)

CMRPC's team has two decades of combined experience successfully managing five EPA brownfields grants of three types. Our FY09 grant was closed in 2014, with all reporting requirements (ACRES, quarterlies, MBE/WBE, etc.) completed. The grant was extended due to initial difficulties finding eligible petroleum sites and to staff turnover late in the grant. **ACRES updates** have been made since closure to include leveraging toward cleanup and redevelopment. Assessments were completed in accordance with all applicable state and federal regulations.

Documentation of Leveraging

Main South Community Development Corporation

875 Main Street
Worcester, Massachusetts 01610
(508) 752-6181 / FAX (508) 797-4514

J. Stephen Teasdale, Executive Director
Mark Waters, President

November 14, 2017

Janet Pierce, Executive Director
Central Massachusetts Regional Planning Commission (CMRPC)
2 Washington Square, Union Station, 2nd Floor
Worcester, MA 01604-4016

Dear Ms. Pierce

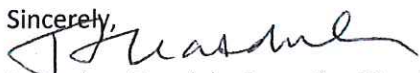
On behalf of the Main South Community Development Corporation, I am pleased to support the Central Massachusetts Regional Planning Commission's (CMRPC) application for \$300,000 in Brownfields Assessment Grant funds from the US Environmental Protection Agency to support hazardous substances and petroleum site assessments in identified areas of brownfields interest.

As a keystone organization in the Main South Community, the Main South CDC works to improve the quality of life in Main South by working on projects and issues that will maintain and/or create safe affordable housing for low-to-moderate income individuals, support economic opportunities for businesses and residents of Main South, enhance the physical image of the area, and instill a sense of neighborhood pride and commitment. To this end, the Main South CDC is well positioned to partner with CMRPC on this important effort.

If awarded, the Main South CDC is prepared to work with CMRPC to assess the site conditions of a property, for which it has an option to purchase, located at 92 Grand Street. To this end, Main South CDC offers a number of commitments to CMRPC including serving on CMRPC's Brownfields Advisory Committee. In addition, the Main South CDC has already secured funding for the site through a pre-development and acquisition loan from the Community Economic Development Assistance Corporation (CEDAC) as well as a conditional commitment of \$825,000 from the City of Worcester's Federal HOME funds. Clark University has also agreed to lend up to \$500,000 over a five-year period to support carrying costs associated with the project prior to closing on the construction financing. In addition to these financial commitments, the Main South CDC will be committing a considerable amount of in kind senior level staff time to help manage the project as it progresses.

The Main South CDC looks forward to continuing to work with CMRPC on this important issue.

Sincerely,



J. Stephen Teasdale, Executive Director
Main South CDC
(508) 752-6181



November 14, 2017

Steve Teasdale
Executive Director
Main South Community Development Corporation
875 Main Street, #1
Worcester, MA 01610

RE: Commitment Letter for CEDAC Acquisition Loan

Dear Mr. Teasdale:

CEDAC is pleased to advise you that on **September 28, 2017** our Board of Directors approved our **commitment to provide an acquisition loan of up to \$900,000 to purchase 92 Grand Street, Worcester, Massachusetts for redevelopment into 49 units of affordable housing.** The loan will be made according to the terms and conditions as will be set forth in the Loan and Security Agreement, and Mortgage and Security Agreement and Assignment of Leases and Rents.

The commitment is based on our present understanding of your Project. If additional facts and circumstances become known to us, we may impose additional terms and conditions.

A Summary of Terms follows:

Amount:	Up to \$900,000 (amount funded includes acquisition costs and Borrower's closing costs);
Borrower:	Main South Community Development Corporation or a limited partnership or limited liability company that has been organized for the purpose of carrying out this project;
Term:	Two years after the date of Closing;
Rate:	Fixed rate of 2.85% per annum;
LTV:	Loan To Value to be based on an appraisal update in process from The Appraisers Group. First mortgage LTV not to exceed 100%;
Security:	First priority mortgage lien, assignment and security interest in the Project, its leases and rents and all related personal property and other collateral; Main South Community Development Corporation will provide a guarantee if another entity is the borrower;
Recourse:	The loan will be a recourse loan;

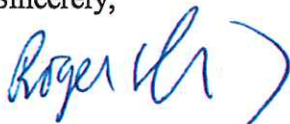
- Origination Fee:** One point (1% of Loan Amount), which equals **\$9,000**; \$4,500 due at commitment, which must be returned along with a signed copy of this letter within 20 days of the date of this letter; the balance of \$4,500 is due at closing;
- Legal Fees:** CEDAC closes its loans in-house as a way to keep legal costs at a minimum. We use outside counsel for title review and deal specific issues as they arise. Those outside legal fee costs will be borne by the borrower;
- Home Funders:** The proposed project and financing plan meets the terms and conditions of Home Funders capital. No less than 20% of the dwelling units shall be rented or sold to families whose annual income is equal to or less than 30% of the median income, adjusted for family size, for the area in which the project is located ("Home Funders ELI units", as determined and set forth in schedules published from time to time by the U.S. Department of Housing and Urban Development ("HUD") (the "Area Median Income"). All of the Home Funders ELI units shall contain 2 or more bedrooms. At least an additional 30% of the dwelling units shall be rented or sold to families whose annual income is equal to or less than 80% of the Area Median Income, adjusted for family size.
- Other:** The preparation, execution, and delivery of all legal documents and supplementary materials identified in Loan Closing Agenda in form and substance satisfactory to CEDAC and CEDAC's counsel; with all items identified in Section B of the closing agenda and a specimen of the Mortgagee's title insurance policy delivered 5 business days prior to loan closing.

All or a portion of the proceeds of the Acquisition Loan may consist of funds from one or more of the following organizations or funding sources: Home Funders Collaborative, LLC; Rockland Trust Company; Massachusetts Life Insurance Community Investment Initiative, LLC; Eastern Bank; Bank of America; Boston Private Bank and Trust; the Massachusetts Department of Housing and Community Development under its Housing Stabilization Fund Program; The John D. and Catherine T. MacArthur Foundation; and/or Capital Improvement and Preservation Funds. Borrower understands and agrees that this Agreement is subject to all applicable terms and requirements of the Organization that funds the loan, as will be further described in the Loan & Security Agreement.

To accept the terms of this commitment, please sign and date the statement below. If, for any reason, the loan contemplated hereby does not close by **March 16, 2018**, this commitment shall

lapse and have no further force or effect, unless extended in writing by CEDAC prior to the
aforementioned closing date.

Sincerely,



Roger Herzog
Executive Director

October 11, 2017

Steve Teasdale
Executive Director
Main South Community Development Corporation
875 Main Street, #1
Worcester, MA 01610

Re: 92 Grand Street

Dear Mr. Teasdale:

I am pleased to inform you that on September 28, 2017, CEDAC's Board of Directors approved a loan (the "Loan") for the captioned 92 Grand Street (the "Project") in an initial commitment of Loan proceeds in the amount of up to \$200,000 (the initial "Authorized Amount"). The proceeds of the Loan may be used to pay for certain technical assistance, predevelopment and site control expenses associated with the Project. Those Project expenses initially authorized to be funded under this Loan are outlined in Exhibit A of the loan agreement enclosed with this letter. This commitment is subject to all applicable CEDAC Guidelines and Terms and Conditions.

Please note that this means you can only request up to \$200,000 at this time. The loan documents included in this package will reflect the Authorized Amount and the maximum loan amount, not to exceed \$400,000 (the "Maximum Loan Amount"). This Maximum Loan Amount is provided so new loan documents do not have to be drafted at the time of an increase. However, the Project must submit a Pre-development Loan Increase Request to CEDAC for CEDAC's Board of Directors to review and approve, in order to be eligible for funds above the Authorized Amount.

CEDAC's commitment to make this Loan is subject to the following conditions:

- Main South Community Development Corporation must enter into a loan agreement with CEDAC. CEDAC expects all its borrowers to repay in full all loan proceeds disbursed by CEDAC with respect to successfully financed projects. In particular, the loan agreement stipulates that all outstanding principal and interest will be repaid to CEDAC out of the initial disbursement of proceeds of the initial financing for the Project. A copy of the loan agreement is enclosed
- Under this loan program governing this Loan, CEDAC will typically disburse all approved amounts to, or on behalf of, Main South Community Development Corporation after submission of appropriate invoices and other supporting information in accordance with CEDAC's standard invoice policies.

- Notwithstanding the Maximum Loan Amount for this Loan set forth above and in the enclosed loan documents, actual disbursements of Loan proceeds may only be approved and made by CEDAC up to the aggregate "Authorized Amount" specifically authorized and approved from time to time by CEDAC's Board of Directors. As noted above, as of the date of this letter CEDAC's Board of Directors only has authorized CEDAC staff to approve and disburse up to \$200,000 and the only authorized uses of such disbursements are outlined in Exhibit A to the loan agreement enclosed with this letter.

To expedite processing of this Loan, all necessary loan documents are enclosed. The enclosed documents have been prepared on the assumption that the full Maximum Loan Amount will eventually be authorized and disbursed. But as noted above, even though the loan documents contemplate that the Loan will eventually be for the Maximum Loan Amount, in no event may the aggregate amount of the Loan proceeds actually disbursed exceed the Authorized Amount approved from time to time by the CEDAC Board. The CEDAC loan package instructions enclosed with this letter explain how to execute the documents.

As noted in our September 2011 mailing, effective September 22, 2011 CEDAC is charging a one percent (1%) loan commitment fee for Predevelopment Loans. A borrower may choose to write a check in the amount of the commitment fee, or use loan proceeds to pay this fee, which will be due upon closing of the predevelopment loan. Included in this packet is an invoice. Should you choose to write a check, please return the check with your signed loan documents. Should you choose to use loan proceeds to pay the fee, please return an original, signed invoice with this option selected.

Once again, congratulations on this award of assistance from CEDAC. We are impressed with the Project and we look forward to making our funds available to Main South Community Development Corporation. If you have any questions regarding your loan commitment or the enclosed documents, please contact your Project Manager, Lionel G. Romain.

Sincerely,



Roger Herzog
Executive Director



Janet A. Pierce	Executive Director
Chris J. Ryan	Community Development
Sujatha Mohanakrishnan	Transportation
Trish Settles	Municipal Collaboration
Dianna Provencher	Business Manager
Denny Drewry	Commission Chair

November 16, 2017

Frank Gardner
Environmental Protection Agency
5 Post Office Square
Suite 100; Mail Code OSRR7-2
Boston, MA 02109-3912

Subject: Commitment of CMRPC match to FY18 Brownfields Assessment Program

Mr. Gardner:

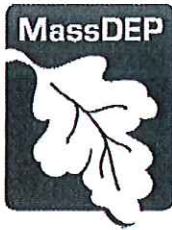
The Central Massachusetts Regional Planning Commission (CMRPC) is pleased to provide an in-kind match to the proposed FY18 Brownfields Assessment Program. In parallel with EPA's grant funds which will be used for staffing of direct program oversight and project management, CMRPC's financial staff will provide grant-eligible financial activities at no cost to the grant. These activities will include drawdowns from EPA's grant system, review and payment of contractor invoices, financial sections of required reports, and directly related accounting. In addition, CMRPC commits to using its counsel to review and update its model brownfields site access agreement at no cost to the grant. I estimate that the value of these contributions during the grant period will be roughly \$2,000.

In addition to the above, should the proposed EPA funds for program staff become inadequate, CMRPC will consider use of its state District Local Technical Assistance (DLTA) funds to supplement EPA's grant. These formula funds may be used for program coordination and community planning and outreach activities. This potential contribution is contingent of continued state funding for the DLTA program. CMRPC will also consider use of internal Local Planning Assistance (LPA) funds for projects in specific communities where EPA funds are inadequate to complete site assessment oversight activities.

Please do not hesitate to contact our brownfields team (Principal Planner Andrew Loew and Regional Services Manager Trish Settles) or me if you have any questions or need further information regarding this commitment.

Sincerely,

Janet A. Pierce,
Executive Director



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Central Regional Office • 8 New Bond Street, Worcester MA 01606 • 508-792-7650

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

November 6, 2017

Central Massachusetts Regional Planning Commission (CMRPC)
2 Washington Square
Union Station, 2nd Floor
Worcester, MA 01604-4016

Attention: Andrew Lowe, Principal Planner
Municipal Collaboration & Regional Services

Dear Mr. Lowe,

The Massachusetts Department of Environmental Protection (MassDEP) fully supports the efforts being made by Central Massachusetts Regional Planning Commission's (CMRPC) to further brownfields development in the communities of Central Massachusetts. MassDEP's Central Regional Brownfield Coordinator shall continue to participate as a member of CMRPC's Brownfield Advisory Committee and provide brownfields technical assistance to help with the mutual goal of supporting brownfield sites for economic development and meeting the cleanup goals of the Massachusetts Contingency Plan.

The CMRPC provides valuable assessment assistance to the owners and developers of distressed brownfield sites, often in environmental justice neighborhoods, that is essential to determining the right cleanup approach to eliminate health risks and return blighted properties to productive reuse. The MassDEP, through our regional offices, often works with the CMRPC and brownfield project proponents to navigate the regulatory and technical challenges often posed by the development of brownfields. MassDEP looks forward to continuing to work with the CMRPC to help make brownfield redevelopment projects a success in Central Massachusetts.

Sincerely,

Mark E. Baldi
Deputy Regional Director
Bureau of Waste Site Cleanup

This information is available in alternate format. Contact Michelle Waters-Ekanem, Director of Diversity/Civil Rights at 617-292-5751.

TTY# MassRelay Service 1-800-439-2370

MassDEP Website: www.mass.gov/dep

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MASSDEVELOPMENT

November 14, 2017

99 High Street
Boston, Massachusetts
02110

Tel: 617-330-2000
800-445-8030

Fax: 617-330-2001

www.massdevelopment.com

Janet Pierce, Executive Director
Central Massachusetts Regional Planning Commission (CMRPC)
2 Washington Square, Union Station, 2nd Floor
Worcester, MA 01604-4016

Dear Ms. Pierce,

I am pleased to offer MassDevelopment's strong support of Central Massachusetts Regional Planning Commission's application for a 2018 EPA Brownfields Assessment Grant.

MassDevelopment is the Commonwealth's economic development and finance authority that through its financing programs and development services helps to create and retain jobs, add housing, eliminate blight and support the economic growth of the communities of the Commonwealth.

As MassDevelopment's regional administrator of the Commonwealth's Brownfields Site Assessment program, I am committed to continuing to work with the Central Massachusetts Regional Planning Commission to provide recoverable grants or unsecured, interest-free financing up to \$100,000 for environmental assessment of brownfields that are eligible in the region and their service area. In addition, the Commonwealth's Brownfields Remediation Loan Program offers flexible loans and recoverable grant funding up to \$500,000 for environmental cleanup of brownfields on eligible projects.

MassDevelopment is committed to continue our active engagement with the Brownfields Advisory Committee of the Central Massachusetts Regional Planning Commission and partnership, providing both support and needing funding to sites to prepare for redevelopment activity. Agency staff is working with the planning commission not only on potential brownfield issues identified in the region, but evaluating ways in which the Agency can financially assist the projects identified by the planning commission in planning and moving distressed properties forward into redevelopment.

The Central Massachusetts Regional Planning Commission has been a great partner with a demonstrated track record of administering brownfields funding on targeted sites and helping to inventory and identify areas of regional brownfields concern. I wholeheartedly support the planning commission's application for an Assessment Grant from EPA, and look forward to continuing to work with them in the future.

Sincerely,

Shyla H. Matthews, CCIM

Vice President of Community Development



November 10, 2017

Ms. Janet Pierce, Executive Director,
Central Massachusetts Regional Planning Commission (CMRPC)
2 Washington Square, Union Station, 2nd Floor
Worcester, MA 01604-4016

Dear Janet,

The Worcester Business Development Corporation (WBDC) supports the Central Massachusetts Regional Planning Commission (CMRPC)'s application for a federal Brownfields Assessment Grant. The WBDC recognizes that brownfield projects are opportunities for economic redevelopment and believe that cleanup of these sites benefits the whole community by helping local governments take advantage of existing infrastructure; protecting citizens from environmental pollutants; helping urban centers market themselves as healthy and productive places to work and live; and supporting sound land use management.

Founded in 1965, the WBDC has played a key role in strengthening the Worcester's region's position as an economic leader in Massachusetts. Brownfields have pose a significant hurdle to successfully redeveloping property and restoring jobs and tax revenue. WBDC and CMRPC share a common goal – identifying and overcoming challenges that impact the health and prosperity of our member communities. The EPA-funded Brownfields Assessment Program is an effective tool in our toolbox, and has a proven track record of facilitating economic development on blighted and underutilized parcels. Over the past year we worked with CMRPC on the identification of freight-based economic development sites that could benefit from enhanced marketing and one such site, the Southwest Industrial Park in Worcester, is a former brownfields site that is a prime site for such development.

The WBDC will support the CMRPC as it applies for this Assessment Grant and will work with CMRPC to inform the community by hosting an informational session for business leaders or advertising the progress of the project on our website. The WBDC is also willing to support the work as part of this Assessment Grant, including participating on the CMRPC's Brownfields Advisory Committee, and future cleanup and redevelopment through other means that might be suggested or requested by the CMRPC, should this grant request be approved and being a . The Worcester Business Development Corporation applauds the CMRPC for its efforts related to Brownfield projects, and fully supports their application.

Sincerely,

A handwritten signature in blue ink, appearing to read "Craig L. Blais", is written over a light blue, stylized oval border.

Craig L. Blais
President and CEO



BOYS & GIRLS CLUB

OF WORCESTER

65 TAINTER ST., WORCESTER, MA 01610

FOUNDED 1889

November 8, 2017

Janet Pierce, Executive Director
Central Massachusetts Regional Planning Commission (CMRPC)
2 Washington Square, Union Station, 2nd Floor
Worcester, MA 01604-4016

Dear Ms. Pierce

On behalf of the Boys and Girls Club of Worcester, I am pleased to support the Central Massachusetts Regional Planning Commission's (CMRPC) application for \$300,000 in Brownfields Assessment Grant funds from the US Environmental Protection Agency to support hazardous substances and petroleum site assessments in identified areas of brownfields interest.

The Boys and Girls Club in Worcester has an extensive community history focused on helping youth develop the qualities needed to become responsible citizens and community leaders. As an active and leading organization in the Main South community, the Boys and Girls Club is well positioned to provide support to CMRPC's application and the identified project located at 92 Grand Street. As a way of showing its commitment to CMRPC's efforts, the Boys and Girls Club of Worcester will provide meeting space to host public community forums.

The Boys and Girls Club of Worcester is excited to partner with CMRPC on this important issue related to health and our environment. If you would like to contact me regarding the proposal, I can be reached at lhilton@bgcworcester.org or 508-754-2686. Thank you for your consideration.

Warmest Regards,

Liz Hamilton, MSW
Executive Director
Boys & Girls Club of Worcester

City of Worcester, Massachusetts

Edward M. Augustus, Jr.
City Manager



Michael E. Traynor, Esq.
Chief Development Officer

November 7, 2017

Mr. Andrew Loew
Principal Planner
Municipal Collaboration & Regional Services
Central Massachusetts Regional Planning Commission
2 Washington Square, 2nd Floor
Worcester, MA 01604

RE: FY2018 EPA Brownfields Assessment Grant Application

Dear Mr. Loew:

On behalf of the City of Worcester, I am writing in support of the Central Massachusetts Regional Planning Commission's (CMRPC) assessment grant application to the U.S. Environmental Protection Agency's (EPA) Fiscal Year 2018 Brownfields Program.

Due to its industrial legacy, the Central Massachusetts region is disproportionately affected by brownfields compared to the nation. The City of Worcester maintains a robust Brownfields Program, often through financial support of the EPA, which helps to create jobs, expand the tax base, improve the health and welfare of the community, and catalyze further economic activity within the City. Mayor Joseph M. Petty hosts a Brownfields Roundtable, which coordinates brownfields redevelopment efforts and priorities across industry leaders in the public and private sectors.

The City of Worcester looks forward to a continued partnership with CMRPC by attending its Brownfields Advisory Committee, site selection and assisting with community outreach efforts. In addition, depending on the merits and eligibility of a project, the City's financial assistance programs, including Community Development Block Grant (CDBG), could be a leveraged resource for the assessment grant.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael E. Traynor".

Michael E. Traynor, Esq.
Chief Development Officer

Executive Office of Economic Development
455 Main Street, 4th Floor, Worcester, Massachusetts 01608
Telephone: (508) 799-1400 Fax: (508) 799-1406
E-Mail: development@worcesterma.gov
www.worcesterma.gov



Community Organization

Commitment Letters

Main South Community Development Corporation

875 Main Street
Worcester, Massachusetts 01610
(508) 752-6181 / FAX (508) 797-4514

J. Stephen Teasdale, Executive Director
Mark Waters, President

November 14, 2017

Janet Pierce, Executive Director
Central Massachusetts Regional Planning Commission (CMRPC)
2 Washington Square, Union Station, 2nd Floor
Worcester, MA 01604-4016

Dear Ms. Pierce

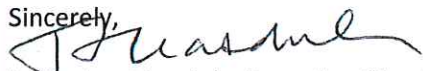
On behalf of the Main South Community Development Corporation, I am pleased to support the Central Massachusetts Regional Planning Commission's (CMRPC) application for \$300,000 in Brownfields Assessment Grant funds from the US Environmental Protection Agency to support hazardous substances and petroleum site assessments in identified areas of brownfields interest.

As a keystone organization in the Main South Community, the Main South CDC works to improve the quality of life in Main South by working on projects and issues that will maintain and/or create safe affordable housing for low-to-moderate income individuals, support economic opportunities for businesses and residents of Main South, enhance the physical image of the area, and instill a sense of neighborhood pride and commitment. To this end, the Main South CDC is well positioned to partner with CMRPC on this important effort.

If awarded, the Main South CDC is prepared to work with CMRPC to assess the site conditions of a property, for which it has an option to purchase, located at 92 Grand Street. To this end, Main South CDC offers a number of commitments to CMRPC including serving on CMRPC's Brownfields Advisory Committee. In addition, the Main South CDC has already secured funding for the site through a pre-development and acquisition loan from the Community Economic Development Assistance Corporation (CEDAC) as well as a conditional commitment of \$825,000 from the City of Worcester's Federal HOME funds. Clark University has also agreed to lend up to \$500,000 over a five-year period to support carrying costs associated with the project prior to closing on the construction financing. In addition to these financial commitments, the Main South CDC will be committing a considerable amount of in kind senior level staff time to help manage the project as it progresses.

The Main South CDC looks forward to continuing to work with CMRPC on this important issue.

Sincerely,



J. Stephen Teasdale, Executive Director
Main South CDC
(508) 752-6181



Regional Environmental Council, Inc.
of Central Massachusetts
P.O. Box 255 • Worcester • MA • 01613
508-799-9139 • 508-799-9147 (fax)

Janet Pierce, Executive Director
Central Massachusetts Regional Planning Commission (CMRPC)
2 Washington Square, Union Station, 2nd Floor
Worcester, MA 01604-4016

Dear Ms. Pierce,

On behalf of the Regional Environmental Council, I am pleased to provide this letter in support of the Central Massachusetts Regional Planning Commission's (CMRPC) application for \$300,000 in Brownfields Assessment Grant funds from the US Environmental Protection Agency to support hazardous substances and petroleum site assessments in identified areas of brownfields interest.

The Regional Environmental Council has been dedicated to building healthy, sustainable, and just communities in the region for more than 40 years. As an organization focused on advocating for social and environmental justice, we are well positioned to help connect CMRPC's brownfields work to environmental justice areas. In providing this letter, the Regional Environmental Council commits to serving on CMRPC's Brownfields Advisory Committee. In this capacity, the Regional Environmental Council will serve as a guiding voice and help direct future work related to brownfields.

The Regional Environmental Council looks forward to continuing to work with CMRPC on this important issue.

Sincerely,

Steven Fischer
Executive Director
Regional Environmental Council, Inc.





November 10, 2017

Ms. Janet Pierce, Executive Director,
Central Massachusetts Regional Planning Commission (CMRPC)
2 Washington Square, Union Station, 2nd Floor
Worcester, MA 01604-4016

Dear Janet,

The Worcester Business Development Corporation (WBDC) supports the Central Massachusetts Regional Planning Commission (CMRPC)'s application for a federal Brownfields Assessment Grant. The WBDC recognizes that brownfield projects are opportunities for economic redevelopment and believe that cleanup of these sites benefits the whole community by helping local governments take advantage of existing infrastructure; protecting citizens from environmental pollutants; helping urban centers market themselves as healthy and productive places to work and live; and supporting sound land use management.

Founded in 1965, the WBDC has played a key role in strengthening the Worcester's region's position as an economic leader in Massachusetts. Brownfields have pose a significant hurdle to successfully redeveloping property and restoring jobs and tax revenue. WBDC and CMRPC share a common goal – identifying and overcoming challenges that impact the health and prosperity of our member communities. The EPA-funded Brownfields Assessment Program is an effective tool in our toolbox, and has a proven track record of facilitating economic development on blighted and underutilized parcels. Over the past year we worked with CMRPC on the identification of freight-based economic development sites that could benefit from enhanced marketing and one such site, the Southwest Industrial Park in Worcester, is a former brownfields site that is a prime site for such development.

The WBDC will support the CMRPC as it applies for this Assessment Grant and will work with CMRPC to inform the community by hosting an informational session for business leaders or advertising the progress of the project on our website. The WBDC is also willing to support the work as part of this Assessment Grant, including participating on the CMRPC's Brownfields Advisory Committee, and future cleanup and redevelopment through other means that might be suggested or requested by the CMRPC, should this grant request be approved and being a . The Worcester Business Development Corporation applauds the CMRPC for its efforts related to Brownfield projects, and fully supports their application.

Sincerely,

A handwritten signature in blue ink, appearing to read "Craig L. Blais", is written over a faint, larger blue outline of the signature.

Craig L. Blais
President and CEO

November 16, 2017

Janet A. Pierce, Executive Director
Central Massachusetts Regional Planning Commission
2 Washington Square, Union Station, 2nd Floor
Worcester, MA 01604-4016

Dear Director Pierce,

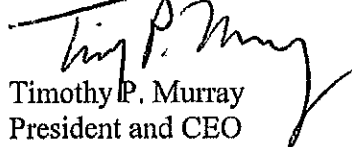
I am pleased to offer the support of the Worcester Regional Chamber of Commerce (Chamber) for the Central Massachusetts Regional Planning Commission's (CMRPC) application for \$300,000 in Brownfields Assessment Grant funds from the US Environmental Protection Agency to support hazardous substances and petroleum site assessments in identified areas of brownfields interest.

The Chamber is in a position to facilitate contacts and communication with the local business community, making us a critical resource moving forward in redeveloping brownfields sites.

As a leading organization working towards economic development in the Central Massachusetts region, the Chamber recognizes the critical role brownfields assessments can play in helping drive future development. To show its commitment to CMRPC's efforts, Chamber will offer its support in helping connect CMRPC's efforts to the business community.

The Worcester Regional Chamber of Commerce looks forward to partnering with CMRPC on this important issue.

Sincerely,


Timothy P. Murray
President and CEO



Blackstone Heritage Corridor, Inc.

670 Linwood Ave. Unit #10, Whitinsville, MA 01588
508-234-4242 • BlackstoneHeritageCorridor.org

Janet Pierce, Executive Director
Central Massachusetts Regional Planning Commission
2 Washington Square, Union Station, 2nd Floor
Worcester, MA 01604-4016

November 15, 2017

Dear Ms. Pierce,

On behalf of Blackstone River Valley National Heritage Corridor, Inc. (BHC), I am pleased to support the Central Massachusetts Regional Planning Commission (CMRPC) application for \$300,000 in Brownfields Assessment Grant funds from the US Environmental Protection Agency to support hazardous substances and petroleum site assessments in identified areas of brownfields interest.

Recognizing the significant impacts brownfields have at the community and regional level, BHC will continue to serve on CMRPC's Brownfields Advisory Committee. In this capacity, BHC will provide technical assistance to support CMRPC's efforts and provide a strong network into the Blackstone region.

BHC's mission is to preserve and promote the Blackstone River Valley National Heritage Corridor's historic, cultural, natural, and recreational resources for current and future generations. By virtue of its role as the designated coordinated entity of the National Heritage Area (ref. U. S. Public Law 113-291 and Massachusetts Chapter 272 of the Act of 2010) is well positioned to work with CMRPC on this important effort. BHC looks forward to its continued work with CMRPC on this important issue.

Yours very truly,

Megan T. DiPrete
Executive Director



208 South Great Road, Lincoln, MA 01773
781.259. 2172 hricci@massaudubon.org

November 9, 2017

Janet Pierce, Executive Director
Central Massachusetts Regional Planning Commission (CMRPC)
2 Washington Square, Union Station, 2nd Floor
Worcester, MA 01604-4016

Dear Ms. Pierce,

Mass Audubon strongly supports the Central Massachusetts Regional Planning Commission (CMRPC)'s application for \$300,000 in Brownfields Assessment Grant from the US Environmental Protection Agency to support hazardous substances and petroleum site assessments in identified areas of brownfields interest. This grant will allow CMRPC to continue its work with member communities characterizing contamination and developing strategies for remediation and reuse in key properties.

Mass Audubon serves as a leader and a catalyst for conservation, by acting directly to protect the nature of Massachusetts and by stimulating individual and institutional action through conservation, education, and advocacy. We have worked with CMRPC as they developed regional plans to identify appropriate priority locations for development. Brownfields are ideal locations to target development from an environmental standpoint, but these sites often pose significant hurdles to redevelopment and associated site restoration, jobs and tax revenue. The EPA-funded Brownfields Assessment is an effective tool, and has a proven track record of facilitating economic development on blighted, underutilized properties. Mass Audubon promotes Smart Growth – and brownfields assessment and redevelopment is Smart Growth. The identified property of 92 Grand St in Worcester is an excellent example – a derelict parcel that provides a blank slate just blocks from Clark University, the Boys and Girls Club of Worcester, a large apartment complex, and Crystal Pond at University Park. CMRPC has made significant progress in assessing contamination in the region with past assessment grants, and we support this ongoing work.

Mass Audubon and CMRPC enjoy a strong relationship that leverages each other's resources to achieve shared goals. We recently partnered with CMRPC to meet with local planners and provide technical assistance to promote smart growth within local bylaws and regulations. Building on these efforts, Mass Audubon will support the CMRPC as it applies for this Assessment Grant, and will work with CMRPC by providing guidance to the Brownfields Advisory Committee.

As a leading conservation organization, we understand the need to lift the air of uncertainty that surrounds properties perceived as contaminated. Mass Audubon applauds CMRPC for its efforts related to Brownfield projects, and fully supports the current effort to secure a grant of \$300,000.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Heidi Ricci".

E. Heidi Ricci
Assistant Director of Advocacy



BOYS & GIRLS CLUB

OF WORCESTER

65 TAINTER ST., WORCESTER, MA 01610

FOUNDED 1889

November 8, 2017

Janet Pierce, Executive Director
Central Massachusetts Regional Planning Commission (CMRPC)
2 Washington Square, Union Station, 2nd Floor
Worcester, MA 01604-4016

Dear Ms. Pierce

On behalf of the Boys and Girls Club of Worcester, I am pleased to support the Central Massachusetts Regional Planning Commission's (CMRPC) application for \$300,000 in Brownfields Assessment Grant funds from the US Environmental Protection Agency to support hazardous substances and petroleum site assessments in identified areas of brownfields interest.

The Boys and Girls Club in Worcester has an extensive community history focused on helping youth develop the qualities needed to become responsible citizens and community leaders. As an active and leading organization in the Main South community, the Boys and Girls Club is well positioned to provide support to CMRPC's application and the identified project located at 92 Grand Street. As a way of showing its commitment to CMRPC's efforts, the Boys and Girls Club of Worcester will provide meeting space to host public community forums.

The Boys and Girls Club of Worcester is excited to partner with CMRPC on this important issue related to health and our environment. If you would like to contact me regarding the proposal, I can be reached at lhilton@bgcworcester.org or 508-754-2686. Thank you for your consideration.

Warmest Regards,

Liz Hamilton, MSW
Executive Director
Boys & Girls Club of Worcester

Threshold Criteria Responses



Janet A. Pierce	Executive Director
Chris J. Ryan	Community Development
Sujatha Mohanakrishnan	Transportation
Trish Settles	Municipal Collaboration
Dianna Provencher	Business Manager
Denny Drewry	Commission Chair

CENTRAL MASSACHUSETTS REGIONAL PLANNING COMMISSION

District Establishment and Organization

The Central Massachusetts Regional Planning Commission (CMRPC) was established as a public body corporate in accordance with Section 3, Chapter 40B of the Massachusetts General Laws, as amended. CMRPC was formed in 1963 as the designated regional planning entity for the Central Massachusetts region. CMRPC's geographic reach includes the City of Worcester and the surrounding 39 communities, encompassing the southern two-thirds of Worcester County. As a special state district and not a direct arm of state government, CMRPC has a Section 115((1) tax exempt status according to the Internal Revenue Code.

District Membership

CMRPC consists of 40 member municipalities. Each community is represented, at a minimum, by at least one delegate and an alternate (based on one member appointed from the planning board and one alternate appointed by the mayor, town manager or selectmen). Based on population other communities have two, three or four delegates and an alternate. There are 71 delegates and 40 alternates in total. A meeting quorum for the full Commission is 18.

District Purpose and Function

CMRPC provides municipal and regional planning for Land Use and Transportation, as well as a variety of Community Development services, Transit Planning for the region's transit authority, Geographic Information Services (GIS), staffing for various Regional Services and Homeland Security functions, and other programs. CMRPC collaborates with local, regional, state and federal officials, and with legislators, in order to bring a regional perspective and a coordinated approach to the planning and development that occurs in this region. The ultimate goal of this agency is to improve the quality of life for those who work and live in the Central Massachusetts region.

CMRPC is governed by an Executive Committee that consists of twelve (12) of the CMRPC's total delegates, which meets monthly. Other standing committees include the Physical Development Committee, the Transportation Committee and the Legislative Affairs Committee.

Part I	ADMINISTRATION OF THE GOVERNMENT
Title VII	CITIES, TOWNS AND DISTRICTS
Chapter 40B	REGIONAL PLANNING
Section 3	PLANNING DISTRICTS; ESTABLISHMENT; NEW MEMBERS; JURISDICTION AREA; RIGHTS AND LIABILITIES

Section 3. Any group of cities, towns, or cities and towns may, by vote of their respective city councils or town meetings, vote to become members of and thus establish a planning district, which shall constitute a public body corporate. After a planning district has been thus established, any other city or town within the district area as hereinafter defined may by vote of its city council or town meeting apply for admission. Upon the affirmative vote of two thirds of the representatives of the cities and towns comprising the district, said city or town shall become a member thereof. The area of jurisdiction of said district shall be an area defined or redefined as an effective regional planning region by the Massachusetts office of business development. All rights, privileges and obligations applicable to the original members of the district shall be applicable to the new members.

Community Involvement Summary (III.B.2)

Community involvement is an important part of CMRPC's proposed assessment program. Broadly speaking our community involvement plan includes three components: 1) general oversight by the standing Brownfields Advisory Committee; 2) regional outreach to promote broad awareness of the assessment program, especially in the target area; and 3) site-specific outreach to identify community concerns and relay assessment results. These components are summarized below.

General Oversight

CMRPC's Brownfields Advisory Committee (BFAC) is composed of staff from six local governments, two state agencies, and several community-based organizations with strengths in environmental advocacy, economic development and community development. Its membership may be broadened during the grant as new partnerships emerge through outreach and project collaboration. The BFAC currently functions mainly as a regional clearinghouse for brownfields information and as the steering committee for CMRPC's regional brownfields plan. All BFAC meetings – roughly three per year – are posted in advance and open to the public. If the grant is awarded, the BFAC will play a key role by helping to review site nominations. Committee member organizations are also critical to the regional outreach process by providing contacts for their diverse user groups.

Regional Outreach

Soon after award, CMRPC will issue a press release notifying the region of the launch of our assessment program. Information will be issued through our website, municipal and brownfields email blast lists, social media (Facebook, Twitter), traditional media, and BFAC partners' contact lists. A contractor will translate the media release and basic program information to Spanish, the major foreign language in the area, for parallel distribution. Materials will be updated and re-distributed periodically throughout the grant period. CMRPC staff will attend and/or notify public meetings of community and municipal organizations to ensure that awareness of the assessment program is high among potential partners as well as the public. CMRPC and its partners will hold two regional public forums about the assessment program, one each during the work day and the evening to maximize public access. Meetings will be held in transit- and ADA-accessible locations within the grant target area and will include childcare if possible. Meetings will be publicized through similar methods to the initial program launch, as well as through channels in the host community. Live translation will be obtained for any meeting held in an area with substantial foreign language speakers or if suggested via forum pre-registrants or by local partners. Accommodations will be made for any communication barriers encountered.

Site-Specific Outreach

A public meeting will be held for each project if requested by the project proponent. At the proponent's preference, meetings will be held either prior to site work to outline the assessment project's work plan and schedule, or afterward to present results and address neighborhood concerns. Meetings will account for language, cultural and access differences and will be held in the immediate project area wherever possible. We will coordinate with individual proponents to identify the best approach for publicizing each site-specific meeting since each community is different. Assessment project status updates will be posted online and distributed by social media

and through the project proponent's own channels, and will be provided to the local municipality if it is not the project proponent. Follow-up meetings will be held for sites where imminent hazard conditions are found or where reuse visioning is part of the project scope. Project progress reports will also be presented at public BFAC meetings.

For more detail on CMRPC's community engagement plan, see section 3.a of the narrative proposal.

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

11/16/2017

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

Central Massachusetts Regional Planning Commission

* b. Employer/Taxpayer Identification Number (EIN/TIN):

04-2318872

* c. Organizational DUNS:

0601143030000

d. Address:

* Street1:

2 Washington Square

Street2:

Union Station

* City:

Worcester

County/Parish:

* State:

MA: Massachusetts

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

01604-4016

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

* First Name:

Andrew

Middle Name:

* Last Name:

Loew

Suffix:

Title: Principal Planner

Organizational Affiliation:

* Telephone Number:

508 459-3339

Fax Number:

* Email:

aloew@cmrpc.org

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

E: Regional Organization

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-17-07

* Title:

FY18 GUIDELINES FOR BROWNFIELDS ASSESSMENT GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

CMRPC FY 2018 Brownfields Assessment Program

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant MA-002

* b. Program/Project MA-1, 2

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date: 10/01/2018

* b. End Date: 09/30/2021

18. Estimated Funding (\$):

* a. Federal	300,000.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	300,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name: Janet

Middle Name:

* Last Name: Pierce

Suffix:

* Title: Executive Director

* Telephone Number: 508 459-3319 Fax Number:

* Email: jpierce@cmrpc.org

* Signature of Authorized Representative: Janet Pierce * Date Signed: 11/16/2017